

EXHIBIT C

Blockchain litigation

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Tue 9/8/2020 6:03 PM

To: Alan Heller <alan.heller@foster.com>

Cc: Adam Sherman <adam@catafagofini.com>

Alan:

Confirming our conversation during which you advised me that counsel in the case surprisingly has never exchanged acceptable search terms for e-discovery

You also confirmed that you would review our proposed search term list (which we will send to you by tomorrow afternoon) to use in conjunction with the email addresses identified in your letter to the court and/or identified in documents you subsequently subpoenaed from third parties (the latter of which you have agreed to provide to us).

Please get back to us with comments to our list and with all email addresses you wish searched as quickly as possible to keep discovery on track.

Thank you.

Jacques Catafago, Esq.

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